



**Eric Gonzalez**  
District Attorney

**DISTRICT ATTORNEY  
KINGS COUNTY**

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**[INSERT NAME]**  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME:** JACKSON FUNARO

**MOS TAX:** [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

**Disclosure # 1:**

THE NYPD HAS SUBSTANTIATED THE FOLLOWING ALLEGATION AGAINST MOS FROM AN INCIDENT ARISING FROM 09/17/2019:

ALLEGATION:

1. BODY WORN CAMERA - FAIL TO WEAR

ACTION TAKEN: SCHEDULE A COMMAND DISCIPLINE

**Disclosure #2 (PENDING):**

THE FOLLOWING ALLEGATIONS, DATED ON OR ABOUT 9/1/20, ARE PENDING AGAINST MOS FUNARO:

**Disclosure #3:**

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

PLAINTIFF	DOCKET	COURT	FILED	DISPOSED	DISPOSITION
Benjamin Cruz	16-CV-603	E.D.N.Y.	2-5-16	1-3-18	Settlement, without admission of fault or liability

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.**

Eric Gonzalez  
District Attorney  
Kings County